

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**MAKE THE ROAD STATES, INC.,  
NAACP BUCKS COUNTY BRANCH  
2253, BUXMONT UNITARIAN  
UNIVERSALIST FELLOWSHIP,  
and JUAN NAVIA,**

**Plaintiffs,**

**v.**

**FREDERICK A. HARRAN,  
individually and in his official  
capacity as Sheriff of Bucks County,  
and BUCKS COUNTY,**

**Defendants.**

**No. 2:25-cv-02938**

**PLAINTIFFS' PETITION FOR ATTORNEYS' FEES**

Plaintiffs Make the Road States, Inc., NAACP Bucks County Branch 2253, Buxmont Unitarian Universalist Fellowship, and Juan Navia (collectively, "Plaintiffs"), through counsel, respectfully petition this Court pursuant to 28 U.S.C. § 1447(c) and the Court's Order of June 27, 2025 (Dkt. 22), for an award of \$35,170.00 in attorneys' fees incurred as a result of the removal filed by Defendant Frederick A. Harran in this matter. The reasons for this Petition are set forth in the accompanying Brief in Support and supporting Declarations, which are fully incorporated by reference herein.

Dated: July 2, 2025

Respectfully submitted,

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By: /s/ Stephen A. Loney, Jr.  
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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the date set forth below, I caused the foregoing document to be served on all parties of record via the Court's CM/ECF system.

Dated: July 2, 2025

s/ Stephen A. Loney